King & Spalding

King & Spalding LLP 1185 Avenue of the Americas New York, NY 10036-4003

Tel: (212) 556-2100 Fax: (212) 556-2222 www.kslaw.com Scott Davidson Direct Dial: 212-556-2164 sdavidson@kslaw.com

August 11, 2016

VIA E-MAIL TRANSMISSION AND ECF FILING

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

Re: In re Motors Liquidation Company, et al.

Case No. 09-50026 (MG)

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("New GM") in the above-referenced matter. Pursuant to Judge Gerber's Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on August 10, 2016, New GM filed the *Petition For Panel Rehearing And Rehearing En Banc of General Motors LLC (GM LLC)* ("Rehearing Petition") with the United States Court of Appeals for the Second Circuit ("Second Circuit") in connection to the Opinion issued on July 13, 2016 by the Second Circuit. A copy of the Rehearing Petition is attached hereto at Exhibit A. Also, on August 10, 2016, the National Association of Manufacturers filed the *Motion to File Amicus Curiae Brief*, with brief attached ("NAM Motion"). A copy of the NAM Motion is attached hereto at Exhibit B.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

Honorable Martin Glenn August 11, 2016 Page 2

SD/hs Encl.

cc: Edward S. Weisfelner
Howard Steel
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
William Weintraub
Gregory Fox
Steve W. Berman
Elizabeth J. Cabraser

Robert C. Hilliard

Gary Peller